



COUNTY OF LOS ANGELES • DEPARTMENT OF HEALTH SERVICES



313 NORTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90012

Reply refer to:
2815 South Grand Avenue, Room 607
Los Angeles, CA 90007
(213) 744-

March 19, 1990

SFUND RECORDS CTR
2166-93672

Gregory Cannoy, Personnel & Industrial Relations
ITT Aerospace Controls
1200 S. Flower
Burbank, Calif. 91502

SFUND RECORDS CTR
88142804

Dear Mr. Cannoy:

FINAL REPORT - BUILDING 8 PREPARED BY A. L. BURKE ENGINEERS, INC.
DATED AUGUST 1989

In reviewing the subject document, on page 14 it states, "Two options were considered for handling the piles. The first option was to ship the areas of the pile most highly affected with PCBs to USE and to blend the rest with clean soil to achieve an overall PCB concentration of less than 50 mg/kg. The second option presented was to ship the entire pile to USE. The first option was selected by ITT as the most cost effective."

The disposal of hazardous waste to unauthorized locations is a violation of both state law (California Health and Safety Code sections 25189, 25189.5 and 25191(d)) and federal law (CFR 40 Resource Conservation and Recovery Act). Mixing clean and contaminated soil together in an attempt obtain laboratory results below the hazardous waste level is not an acceptable practice.

Provide this office by March 23, 1990, with your rationale (in writing) for choosing the first option above and who was responsible for the decision. If you have any questions, please feel free to call Philip V. Kani at (213) 744-3223.

Very truly yours,

William Jones, M.S., Chief
Investigative Section
Hazardous Materials Control Program

WJ:PK030190

cc: A. L. Burke
State Department of Health Services, Burbank Toxic Division

AMC0009



COUNTY OF LOS ANGELES • DEPARTMENT OF HEALTH SERVICES



313 NORTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90012

Reply refer to:
2615 South Grand Avenue, Room 607
Los Angeles, CA 90007
(213) 744-

January 17, 1990

Gregory Cannoy, Personnel & Industrial Relations
ITT Aerospace Controls
1200 S. Flower
Burbank, Calif. 91502

Dear Mr. Cannoy:

WORKPLAN FOR BUILDING 8

This Department has completed a review of the workplan, dated November 27, 1989, submitted by your consultant, Roy F. Weston (Weston). As discussed in telephone conversations between Susanne Kraemer of Weston and Philip V. Kani of this Department on January 9, 1990, an approval is hereby granted for implementation of the workplan. This approval is contingent upon you and your representative complying with the following:

1. You are hereby directed to provide to this Department all technical reports, correspondence, and other documents pertinent to building 8 by February 5, 1990 which shall include:
 - a) A. L. Burke's Final Draft Report for building 8 dated August 1989.
 - b) Photographs taken during the remediation of the building 8 site.
 - c) All manifests pertaining to the remediation of the building 8 site.
 - d) Results of the PCB, dioxins and dibenzofurans sampling.
 - e) All related reports for building 8 including the underground sump removal, boring logs, chain of custody documentation, quality assurance/quality control details etc.
2. A risk assessment using Federal and/or State guidance documents must be performed if site contaminants are not completely removed.
3. Provide justification why the soils at the building 8

Gregory Cannoy
January 17, 1990
Page 2

site are only being tested for PCBs. If testing for VOCs are performed, the samples shall be from undisturbed soil and properly secured.

4. Boring locations shall be specified and located on a site map.
5. At minimum, due to the lack of known contamination levels, workers sampling in the building 8 area shall be in level C until justification can be provided to wear a lower level of protection.
6. Permits and/or approvals for work associated with the workplan must be obtained from all appropriate agencies.
7. This workplan must be implemented by February 10, 1990.
8. Notify this office three (3) working days prior to the implementation of this workplan.

It should be noted, based on the review of the above requested documents and results from this workplan, additional sampling and/or remediation may be required.

If you have any questions, please feel free to call Philip V. Kani at (213) 744-5312 or 744-3223.

Very truly yours,

William Jones
William Jones, M.S., Chief
Investigative Section
Hazardous Materials Control Program

WJ:PK010990

cc: Teresa Holcomb, ITT
Susanne Kraemer, Weston